USDA

The following is a collection of comments from Minnesota's NAIS external steering committee. Some comments have been abbreviated or condensed by me, but are designed to represent what our steering committee wishes to say to USDA about the draft document. Some of our committee members have also submitted comments individually. Our NAIS committee in Minnesota represents auction markets, producers, agricultural organizations, technology industry leaders, state government, extension educators, and academia.

General comments

"Dave, we have been told by several people that we are wasting our time, and that this is all cut and dried. I hope this is not the case, and that public comment is at least given some consideration in this matter."

"**Premises ID:** Many small farmers/land owners (with 100 head of stock cows or less) rent pasture land for animals. They are often in areas where 40 to 80 acres is the size of the pasture from a neighbor. These pasture, will hand maybe 10 to 20 cow-calf pairs for a few weeks. It is necessary to keep it simple on the premises ID. Issue a premises number to the producer, this number could be implemented into the rent agreement with the land owner. **Then when the producer places cattle in the pasture a premises ID sign would be placed on the gate by the producer identifying the cattle owner.** If the producer has ten pastures, he would have to place his sign on all ten gates when cattle are in them."

"**Brand Identification**: Due to the vast number of cattle which, are presently branded, either by a hot or freeze brand method for identification it appears that would be the logical starting point. Then work to incorporate the brand with other forms of identification systems that are or may become available. This system has worked for years and still could work. "

Answers to USDA's questions

1. Is a mandatory NAIS necessary?
YES

2. Point of compliance?
Movement of an animal should be reported within 24-48 hours of its occurrence (arrival) at a new premises or sighting at premises (would include rendering reporting and dead reporting).

3. Tagging Services?
Yes

4. Who/When/How to Achieve Reporting Requirements?
The owner of the animal should report within 24-48 hours of arriving at new premises or the owner (or their agent) reports the event.

5. When to apply AIN?
All animals should be tagged prior to leaving the premises of origin for any reason (other than tagging or group movements) and prior to commingling with any animal(s) from another premises.

6. Timelines?
No consensus

7. Timelines/Species?
The proposed timeline should be the maximum allowed schedule for all species. Where a species can move forward to mandatory compliance sooner, encourage them to do that.

8. Data Submission?
Methods to submit should include direct internet access, electronic batch file transfer and mail in form.
Who submits?
Owners, markets, processor and third party vendors acting as agents for owners.

9. Data Protection?
Protect all data. This information is all business related and should only be held by the government for its intended use, to protect the health and safety of our national cattle herd.

Privately Managed Systems?
Oversight by animal health officials to have credibility.
Allow for but not limit to.

Public System?
Yes, we should have a basic public system available to those that don't have a need or desire to participate in a private system. These are primarily commodity producers that produce livestock for general sale and not in a value added program.

Private Systems-All Species?
No consensus

Either System – state level?
Yes
State must retain ownership of data.